

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No. 9:24-cv-80395-RLR-BER

GREENFLIGHT VENTURE CORPORATION,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

**MOTION TO APPEAR PRO HAC VICE,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission pro hac vice of Kenneth C. Smurzynski of the law firm of Williams & Connolly LLP 680 Maine Avenue SW Washington, DC 20024 (202) 434-5000, for purposes of appearance as co-counsel on behalf of Defendant Google LLC, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Kenneth C. Smurzynski to receive electronic filings in this case, and in support thereof states as follows:

1. Kenneth C. Smurzynski is not admitted to practice in the Southern District of Florida and is a member in good standing of the Maryland State Bar, the District of Columbia Bar (No. 442131), the United States Supreme Court, the United States Court of Appeals for the District of Columbia Circuit, the United States Court of Appeals for the First Circuit, the United States

Court of Appeals for the Third Circuit, the United States Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the District of Columbia, and the United States District Court for the District of Maryland.

2. Movant, Sujey Herrera, Esquire, of the law firm of Reed Smith LLC, 200 S. Biscayne Blvd. Ste 2600 Miami, FL 33131 (786) 747.0200, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. See Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Kenneth C. Smurzynski has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Kenneth C. Smurzynski, by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Kenneth C. Smurzynski at email address: KSmurzynski@wc.com

WHEREFORE, Sujey Herrera, moves this Court to enter an Order permitting Kenneth C. Smurzynski, to appear before this Court on behalf of Defendant Google LLC, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Kenneth C. Smurzynski.

Date: September 4, 2024

Respectfully submitted,

/s/ Sujey Herrera
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Sujey Herrera (Florida Bar No. 92445)
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GREENFLIGHT VENTURE CORPORATION,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

CERTIFICATION OF KENNETH SMURZYNSKI

Kenneth Smurzynski, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the Maryland State Bar, the District of Columbia Bar (No. 442131), the United States Supreme Court, the United States Court of Appeals for the District of Columbia Circuit, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the District of Columbia, and the United States District Court for the District of Maryland; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.

Date: September 4, 2024

/s/ Kenneth Smurzynski

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